

Minutes of the August 8, 2019 Meeting
Small Water Systems Technical Assistance Center (TAC)
Advisory Board

A regular meeting of the TAC Board was called to order by Chairperson Serena DiMagno at 9:05 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to review and discuss pre-draft technical guidance documents.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Doug Crawshaw, American Water Works Association (AWWA)
Serena DiMagno, Water Works Operators Association of Pennsylvania (WWOAP)
Christine Maloni Hoover, Office of Consumer Advocate (OCA)
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
Sukhwindar Singh, RCAP Solutions
James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP) – *via webinar*
Christine Caldara Piatos, Center for Rural Pennsylvania (CRP)
Jennifer Case, Pennsylvania Municipal Authorities Association (PMAA)
Sharon Fillmann, American Water Works Association (AWWA)
Joel Jordan, Pennsylvania Rural Water Association (PRWA) – *via webinar*
Mike Kelly, Department Community and Economic Development (DCED)
Mary Gaiski, Pennsylvania Manufactured Housing Association (PMHA)
Clint McKinley, Pennsylvania Public Utility Commission (PUC)
Larry Miller, Pennsylvania Builders Association (PBA)
Tesra Schlupp, Pennsylvania Infrastructure Investment Authority (PIIA)
James Wheeler, Pennsylvania State Association of Township Supervisors (PSATS)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)
League of Women Voters, Pennsylvania
Pennsylvania Association of Conservation Districts, Inc. (PACD)
Pennsylvania Association of Realtors (PAR)
Rural Utilities Service/Rural Development (RUS)

Members/alternates from 14 organizations were present; therefore, a quorum was achieved.

The following Department of Environmental Protection (DEP) staff were present:

Jeff Allgyer, Bureau of Safe Drinking Water
Angie Anderson, Bureau of Safe Drinking Water
Jill Anderson, Bureau of Safe Drinking Water
Kevin Anderson, Bureau of Safe Drinking Water
Brad Baker, Bureau of Safe Drinking Water
Tom Barron, Bureau of Clean Water
Brian Chalfant, Policy Office
Ed Chescattie, Bureau of Safe Drinking Water
Bill Cumings, Office of Chief Counsel
Mike Hess, Bureau of Safe Drinking Water
Dawn Hissner, Bureau of Safe Drinking Water

Matt Kundrat, Bureau of Clean Water
Rod McAllister, Bureau of Clean Water
Bill McNamara, Bureau of Safe Drinking Water
David Mittner, Bureau of Safe Drinking Water
Michelle Moses, Office of Chief Counsel
Chad Reisch, Bureau of Safe Drinking Water
Pauline Risser, Bureau of Safe Drinking Water
Kim Snook, Bureau of Safe Drinking Water
Gary Walters, Bureau of Clean Water
Sue Weaver, Bureau of Safe Drinking Water

Non-Members present at the meeting:

Alison Aminto, Philadelphia Water Department
Merlin Daniel, Philadelphia Water Department
Rita Kopansky, Philadelphia Water Department
Dennis O'Connor, Philadelphia Water Department

Matt Walborn, Western Berks Water Authority
Erik Ross, Milliron & Goodman
Wanda Rios Martinez, RCAP Solutions – *via webinar*

General Advisory Board business:

One item of general business was discussed:

The draft minutes from the Jan 31, 2019 TAC Board meeting were presented for discussion. One edit to correct the spelling of a name (C. Calera-Piatos should be C. Caldara Piatos) was requested. Mary Gaiski (PMHA) made a motion to approve the Jan 31, 2019 minutes with the edit; Mary Roland (SBCSTPWWO) seconded the motion. The motion passed by a unanimous vote.

Proposed Manganese (Mn) Water Quality Standard

Staff from the Water Quality Standards Section in the Bureau of Clean Water (BCW) presented an updated overview of proposed changes to the Water Quality Standard for Manganese. The revised presentation will be posted to the TAC website after the meeting.

- BCW's goal is to present the proposed regulation to the Environmental Quality Board (EQB) in December, so the public comment period for the proposed rule may occur as early as March 2020.
- The presentation included the motion from the Water Resources Advisory Committee (WRAC):
 1. To acknowledge the legislative requirement in Act 40 of 2017 to propose a regulation moving the point of compliance for manganese to the point of all existing or planned surface potable water supply withdrawals; AND
 2. To support proposing a regulation either through the Annex or by discussion in the Preamble (whichever is the most legally appropriate) that adds manganese to Table 5 in section 93.8c as a toxic substance for human health at the level of 0.3 mg/L. The compliance point for this standard will be met in all surface waters, as described in section 96.3(c); AND
 3. To recommend that the EQB request public comment on this combined approach for consideration in developing a final regulation.

- Serena DiMagno (WVOAP) made a motion that TAC concurs with the WRAC recommendations. It was seconded by Christine Hoover (OCA). The discussion was to further clarify the WRAC recommendations:
 - Although the point of compliance will be moved from the discharge point downstream to the PWS point of intake, WRAC recommends that the WQ standard be lowered from 1 mg/L to 0.3 mg/L in ambient waters.
 - Although this proposal would lower Mn levels at the PWS intake, there may still be a significant cost to water suppliers that have NPDES discharge permits because they would have to meet lower discharge limits. If adopted, BCW would review Mn limits as part of a facility's next permit renewal.
 - The motion passed by a voice majority vote.

General Discussion - Technical Guidance Document Review

- TAC members are very concerned that they were given less than 2 weeks to review substantive revisions to several technical guidance documents (TGDs). There are 5 different TGDs on the agenda and one (the PWS Manual-Part II) is nearly 200 pages, yet these documents were only made available to the members on July 31 (8 days before this meeting).
 - This is **not** enough time to share these pre-draft documents with their respective organizations and obtain reasoned & thoughtful comments.
 - Additionally, there is no way to determine what has been revised.
- TAC requests that DEP:
 - Allow more time to review substantive edits to TGDs or have a subcommittee participate in the TGD development;
 - Provide either a track changes version of the document or a summary of what has been changed;
 - Limit the number of TGDs to be reviewed/discussed in any one meeting.
- DEP noted that all the TGDs on today's agenda will be published as DRAFT for public comments because the revisions are considered substantive.

SDW Updates - Unregulated Contaminants & Health Advisories

- PFAS Updates: DEP collected ~100 entry point samples to date and results received for about 40 of these samples.
 - Several results Not Detected; some results have low detections; highest detection from PWS in Cumberland Co. but still well below the Health Advisory Level (HAL). Results will be posted to DEP PFAS website (updated quarterly).
 - A few PWSs have scheduled split sampling (less than 10) with DEP.
 - Try to schedule sampling at least 2 weeks in advance of sample date. PWS gets letter from DEP about results before data is posted to the website.
 - If any result > HAL, DEP contacts PWS by phone ASAP.
- Harmful Algal Blooms (HABs)/Cyanotoxins
 - BCW and DCNR staff have been doing sampling and getting results of cyanotoxin detections.

- Some PWSs have been asked to do some sampling but finished water results have not exceeded 10-day HAL.
- DEP has a PN template (Do Not Drink) for microcystins results above HAL and is developing additional templates.
- PA is not yet offering accreditation for these parameters/methods, so PWSs must rely on labs that are EPA-approved for UCMR4.
- If PWSs doing sampling, DEP requesting the local office be notified of the results.

Discussion - TGD 1, *Laboratory Reporting Instructions for Total Coliform and E. coli in Public Water Systems*

- DEP explained that the changes to this document were made to include Groundwater Rule (GWR) and Revised Total Coliform Rule (RTCR) regulations:
 - Updated contaminant and method codes.
 - Updated examples to include Drinking Water Electronic Reporting (DWELR) system screens.
 - Updated sections on monitoring requirements because separate Key Requirements guidance documents no longer maintained.
- TAC requested clarification & additional detail be provided for the flow charts and examples; TAC also noted a few typographical errors that need to be corrected.

Discussion - TGD 2, *Laboratory Reporting Instructions for Chemical Contaminants in Drinking Water*

- DEP explained that the changes to this document were made to include 2009 and 2018 General Update and Disinfection Requirements Rule (DRR) regulations:
 - Updated contaminant and method codes.
 - Updated responsibilities of the lab.
 - Updated examples to include DWELR screens.
 - Updated sections on monitoring requirements because separate Key Requirements guidance documents no longer maintained.
- TAC noted a few typographical errors that need to be corrected.

Discussion - TGD 3, *Laboratory Reporting Instructions for Disinfection Byproducts and Precursors*

- DEP explained that the changes to this document were made to include Stage 2 Disinfection Byproducts Rule (DBPR) and DRR regulations. This document has also been split into 2 TGDs – this one and a separate one for disinfectant residuals (to be presented to TAC at the next meeting).
 - Updated contaminant and method codes.
 - Updated examples to include DWELR screens.
 - Updated sections on monitoring requirements because separate Key Requirements guidance documents no longer maintained.
- TAC requested an explanation for enhanced coagulation and clarification on Total Organic Carbon (TOC) compliance; TAC also noted a few typographical errors that need to be corrected.

Discussion - TGD 4, Filter Rules Reporting Instructions for Public Water Systems Using Filtered Surface Water or Groundwater Under the Direct Influence of Surface Water (GUDI) Sources

- DEP explained that the changes to this document were made to include 2018 General Update requirements.
 - Updated contaminant and method codes.
 - Updated SDWA-5 form.
 - Updated examples to include DWELR screens.
 - Updated sections on monitoring requirements because separate Key Requirements guidance documents no longer maintained.
- TAC had questions/concerns regarding the compliance calculations for Combined Filter Effluent (CFE) turbidity now that continuous monitoring/ recording is required.
- TAC mentioned that local DEP staff are denying implementation date extension requests when the PWS needs to make capital improvements. DEP requested specific issues be brought to Ed Chescattie.
- TAC also requested clarification on operation of dual filters and DEP's requirement for separate Individual Filter Effluent (IFE) turbidimeters. DEP explained separate IFE turbidimeters are required if the dual filters are operated as separate filters and this is based rule implementation clarification from EPA .
- TAC requested clarification on what is expected for 5 "working days" based on an example in Section 6; DEP should clarify whether the requirement is based on calendar dates or each 24-hour period and that working days may (or may not) include a weekend based on whether the filter plant operates 24/7.
- TAC provided a few formatting suggestions.

Discussion - TGD 5, Public Water Supply Manual, Part II – Community System Design Standards

- DEP explained that all portions of this document have been significantly revised because it was last updated in 2006. TAC expressed concern that without any details as to what has changed, they need to do a page by page comparison of the old to the new versions to understand what was updated. TAC again stated that 8 days to review this TGD in order to provide constructive comments is NOT sufficient.
 - Revisions were needed to incorporate new treatment technologies and to conform to DEP regulations, current AWWA standards and the 2018 10-States' standards.
 - Under the Treatment section there are new details on chloramines, UV, membrane filtration, bag/cartridge filters, ion exchange, nanofiltration/RO and arsenic.
 - Additional details included on what is needed for Simultaneous Compliance documentation.
- DEP will add this TGD to the November meeting to allow additional time for TAC review. TAC recommended that DEP allow at least a 60-day public comment period for this TGD. If Part IV of the PWS Manual is posted for public comment, TAC requested that TGD also be added to the November agenda.

Adjourn

Jim Steele made a motion to adjourn. The motion passed by a unanimous vote, and the meeting adjourned at 2:30 PM.